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\*ADMITTED IN DC ONLY

May 26, 2015

Re: *HLP Properties, LLC, et al. v. Consolidated Edison Company of  
New York, Inc.* Docket No. 14-CV-1383(LGS)

Dear Judge Schofield:

I write today **ONLY** to acknowledge Plaintiffs' May 25, 2015 letter (received by us at 10:26 PM) which transmitted a DVD and purported to claw back 29 documents. Once we were able to unscramble it, our preliminary review of the DVD reveals that Plaintiffs now admit that at least an additional **6,263** Langan documents were previously listed incorrectly on their privilege logs (something over **70%**).

Based on this latest development, Defendant Con Edison respectfully renews its position most recently set forth in my May 22 letter and its request for a review of Plaintiffs' privilege logs by an impartial officer, also contained in that letter.

Subsequent to receiving this delivery from Plaintiffs last night, at 8:01 this morning we received a copy of another letter to the Court from Plaintiffs to which we will respond in due course once we have seen Plaintiffs' submissions due today and tomorrow.

Respectfully submitted,

/s/ Thomas J. Kavalier

Thomas J. Kavalier

The Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

VIA ECF

cc: Counsel of record